

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE: MULTIPLAN HEALTH  
INSURANCE PROVIDER LITIGATION

This Document Relates To:

1:24-cv-7177

1:24-cv-6802

Case No. 1:24-cv-6795  
MDL No. 3121

Hon. Matthew F. Kennelly

**DECLARATION OF SADIK HUSENY IN SUPPORT OF DEFENDANTS'**  
**JOINT MOTION TO DISMISS THE CONSOLIDATED CLASS ACTION COMPLAINT**

I, Sadik Huseny, declare as follows:

1. I am a partner with the law firm Latham & Watkins LLP, attorneys for Defendants MultiPlan, Inc., MultiPlan Corporation, Viant, Inc., Viant Payment Systems, Inc., and National Care Network, LLC in connection with this action. I submit this Declaration in support of Defendants' Joint Motion to Dismiss the Consolidated Class Action Complaint in the above captioned matter.

2. Attached as **Exhibit A** to this Declaration is a true and correct copy of the Order Sustaining Multiplan Defendants' Demurrer to Plaintiff's First Amended Complaint, *VHS Liq. Trust v. MultiPlan Corp.*, No. CGC-21-594966 (Cal. Super. Ct. Aug. 9, 2024).

3. Attached as **Exhibit B** to this Declaration is a true and correct copy of a report titled "An Analysis of Reasonable and Customary Out-of-Network Reimbursement Rates," by the Office of the N.Y. State Comptroller, dated April 2020.

4. Attached as **Exhibit C** to this Declaration is a true and correct copy of a MultiPlan document titled "A Better Reference for Pricing," dated August 2019.

I declare under penalty of perjury that the foregoing is true and correct, and that this Declaration was made this 16th day of January 2025.

/s/ Sadik Huseny  
Sadik Huseny  
of Latham & Watkins LLP

*Counsel for Defendants MultiPlan, Inc.;  
MultiPlan Corporation; Viant, Inc.; Viant  
Payment Systems, Inc.; and National Care  
Network, LLC*